From: <u>Jay Field</u>

To: <u>Dana Davoli/R10/USEPA/US@EPA</u>

Cc: anderson.jim@deq.state.or.us; audiehuber@ctuir.com; BBarquin@hk-law.com; Benjamin Shorr; Burt

Shephard/R10/USEPA/US@EPA; Chip Humphrey/R10/USEPA/US@EPA; csmith@parametrix.com; Eric Blischke/R10/USEPA/US@EPA; erin.madden@gmail.com; Gina Grepo-Grove/R10/USEPA/US@EPA; howp@critfc.org; jeremy buck@fws.gov; Joe Goulet/R10/USEPA/US@EPA; LavelleJM@cdm.com;

<u>Lisa.Bluelake@grandronde.org</u>; <u>Lori Cora/R10/USEPA/US@EPA</u>; <u>Mary.Baker@noaa.gov</u>; <u>MCCLINCY Matt</u>; <u>Michael.Karnosh@grandronde.org</u>; <u>Jennifer L Peterson</u>; <u>POULSEN Mike</u>; <u>Rene Fuentes/R10/USEPA/US@EPA</u>;

rgensemer@parametrix.com; Robert.Neely@noaa.gov; rose@yakama.com; sheila@ridolfi.com;

tomd@ctsi.nsn.us

Subject: Re: Fw: Portland Harbor HH bass composites

**Date:** 10/02/2007 10:42 AM

```
Dana, The guidance specifically recommends using equal amount of homogenate from individual fish to create the composite (see Figure 7-1. Preparation of fish fillet composite homogenate sample and p. 7-15: "Composite homogenates should be prepared from equal weights of individual homogenates."). If the recommended approach is not followed, you will have unequal sample size in your composites, which will not provide an unbiased estimate of the mean. If the guidance for creating composite samples is followed, I would have no problem using the 0.75 length factor for creating acceptable composites. Note that the guidance also recommends archiving homogenate from each individual fish. Jay
Davoli.Dana@epamail.epa.gov wrote:
> Jay, I do not think the guidance recommends using unequal amounts from
> each fish to create the composite. I have included the language from the
> guidance below so you can make your own interpretation. The site is:
> http://www.epa.gov/waterscience/fishadvice/volumel/vlch6.pdf
 > 6.1.1.6 Sample Type
    (Page 6-18)
Note: Composite samples are homogeneous mixtures of samples from two or more individual organisms of the same species collected at a particular
    site and
    analyzed as a single sample. Because the costs of performing individual
 > chemical
    analyses are usually higher than the costs of sample collection and
    preparation, composite samples are most cost-effective for estimating average tissue
     concentrations of target analytes in target species populations. Besides
    being cost-effective, composite samples also ensure adequate sample mass to
> allow
    analyses for all recommended target analytes. A disadvantage of using composite samples, however, is that extreme contaminant concentration
     values
 > for individual organisms are lost.
> In screening studies, EPA recommends that states analyze one composite > sample for each of two target species at each screening site. Organisms
   a composite sample:
   Must all be of the same species
   Should satisfy any legal requirements of harvestable size or weight, or at least
be of consumable size if no legal harvest requirements are in effect.
   Should be of similar size so that the smallest individual in a
> Should be of similar size so that the smallest individual in a composite is no > less than 75 percent of the total length (size) of the largest > individual Should be collected at the same time (i.e., collected as > close to the same time as possible but no more than 1 week apart) [Note: > This assumes that a
> sampling crew was unable to collect all fish needed to prepare the > composite
    sample on the same day. If organisms used in the same composite are collected on different days (no more than 1 week apart), they should be processed within 24 hours as described in Section 7.2 except that individual
    fish may have to be filleted and frozen until all the fish to be included in the composite are delivered to the laboratory. At that time, the composite
> homogenate sample may be prepared.]
> Should be collected in sufficient numbers to provide a 200-g
          composite
 > homogenate sample of edible tissue for analysis of recommended target
    analytes.
    Individual organisms used in composite samples must be of the same
    species
     because of the significant species-specific bioaccumulation potential.
    Accurate
     taxonomic identification is essential in preventing the mixing of
    closely related species with the target species. Note: Individuals from different
    species should
 > not be used in a single composite sample (U.S. EPA, 1989d, 1990d).
> For cost-effectiveness, EPA recommends that states collect only one size
 > for each target species and focus on the larger individuals commonly
```

```
> by the local population. Ideally, each composite sample for a specific > species
should contain the same number of individual fish and the individuals
  within each
  target species composite should be of similar size within a target size
 range so
       the composite samples for a particular species are comparable over
  a wide
  geographic area. This is particularly important when states want to
  compare data
     an individual species that might be used to establish a statewide
 advisory.
> For persistent chlorinated organic compounds (e.g., DDT, dioxin, PCBs,
  and
  toxaphene) and methylmercury, the larger (older) individuals within a
  population
  are generally the most contaminated (Phillips, 1980; Voiland et al., 1991). As noted earlier, this correlation between increasing size and increasing
  contaminant.
  concentration is most striking in freshwater finfish species but is less
  evident in
 estuarine and marine species. Size is used as a surrogate for age, which provides some estimate of the total time the individual organism has been at risk
  of exposure. Therefore, the primary target size range ideally should
  include the
  larger individuals harvested at each sampling site. In this way, the
 states will maximize their chances of detecting high levels of chemical
  contamination in the
  single composite sample collected for each target species. If this ideal
  condition
 cannot be met, the field sampling team should retain individuals of
> similar length
> that fall within a secondary target size range.
> Individual organisms used in composite samples should be of similar size
  (WDNR, 1988). Note: Ideally, for fish or shellfish, the total length (or size)
  of the smallest
  individual in any composite sample should be no less than 75 percent of
  the total
  length (or size) of the largest individual in the composite sample (U.S.
  EPA
  1990d). For example, if the largest fish is 200 mm, then the smallest
  individual included in the composite sample should be at least 150 mm. In the
  California
  Mussel Watch Program, a predetermined size range (55 to 65 mm) for the
  target
  bivalves (Mytilus californianus and M. edulis) is used as a sample
  selection
  criterion at all sampling sites to reduce size-related variability (Phillips, 1988).
  Similarly, the Texas Water Commission (1990) specifies the target size
  range for
  each of the recommended target fish species collected in the state's
> fish
  contaminant monitoring program.
  Individual organisms used in a composite sample ideally should be
  collected at
  the same time so that temporal changes in contaminant concentrations
  associated with the reproduction cycle of the target species are
  minimized.
 Each composite sample should contain 200 g of tissue so that sufficient
  material
  will be available for the analysis of all recommended target analytes. A
  larger
  composite sample mass may be required when the number of target analytes
  increased to address regional or site-specific concerns. However, the
  tissue
  mass may be reduced in the Tier 2 intensive studies (Phase I and II)
 when a
  limited number of specific analytes of concern have been identified (see
 Section
  7.2.2.9). Given the variability in size among target species, only
 approximate ranges can be suggested for the number of individual organisms to
  collect to
  achieve adequate mass in screening studies (U.S. EPA, 1989d; Versar,
  1982).
For fish, 3 to 10 individuals should be collected for a composite sample for each
  target species; for shellfish, 3 to 50 individuals should be collected for a composite
  sample. In some cases, however, more than 50 small shellfish (e.g.,
  mussels,
  shrimp, crayfish) may be needed to obtain the recommended 200-g sample
 mass. 
Note: The same number of individuals should be used in each composite
  sample
  for a given target species at each sampling site.
> Deviations from the recommended study design have implications that may
> make
```

> harvested

```
the statistical analyses more complicated. The statistical methods for
     analyzing composite samples are made tractable and easier-to-use by simplifying
> the study
                         Using equal numbers of fish in replicate composite samples is
     design.
     one way
to do this. For example, with equal numbers of fish, the arithmetic
     average of the
    replicate composite measurements is an unbiased estimator of the
     population
    mean. When unequal numbers are used, the arithmetic average is no longer unbiased. Instead, a weighted average of the composite measurements is calculated, where the weight for each composite reflects the number of fish it is
    made up of. Oftentimes fish are lost or damaged prior to compositing.
     When
     several fish are damaged or lost, the allocation of the remaining fish
    to
     composites may be reconfigured to allow equal numbers of fish in
     composites. If this is not possible, care should be taken to adjust the statistical
     procedures to
     account for the unequal allocations.
    The use of sizes of fish exceeding the size range recommended for
     compositing
    may introduce more variability. If it is the size range within each composite that % \left( 1\right) =\left( 1\right) \left( 1\right
     is broadened (e.g., 100-200 mm instead of 150-200 mm), the variability
     within the
     composite may increase. If additional composites are made with fish
     exceeding
     the recommended size ranges (e.g., adding composites of fish of size 300-450
    mm when the target size is no more than 250 mm), this may increase the variability between composites of different size ranges. Overall inferences made
    from composites of different size ranges will have increased variability associated
    with them (e.g., wider confidence intervals).
> Differences in the numbers of replicates at different sampling locations
> may
     complicate any comparisons to be made between locations or overall
     conclusions
     to be obtained by combining the results from different sampling locations. As with
     unequal numbers of fish in composites, unequal numbers of replicate
     samples
     complicate the statistical calculations. The appropriate weighted
     estimates should
     be used when combining information from different sampling locations.
     Consider,
> for instance, a state that monitors five lakes each year. If the state
     uses the same target fish species, the same number of fish per composite and the same
     size
    ranges,
                       the overall mean level of contamination will be a
    straightforward average
    over the five locations if the same number of replicates are used at each location.
     However,
                           if unequal numbers of replicates are used, the information
     contributed
    by each location is not the same and must be weighted accordingly.
    As alluded to above, one limitation of using composite samples is that
     information
     on extreme levels of chemical contamination in individual organisms is
    Therefore, EPA recommends that the residual individual homogenates be
     to allow for analyses of individual specimens if resources permit
     (Versar, 1982).

Analysis of individual homogenates allows states to estimate the underlying
     population variance which, as described in Section 6.1.2.6, facilitates
     sample size
     determination for the intensive studies. Furthermore, individual
    homogenates
    may also be used to provide materials for split and spike samples for routine \ensuremath{\mathbb{Q}} \ensuremath{\mathbb{C}}
    procedures either for composites or individual organisms (see Section 8.3). The
    circumstances in which the analysis of individual fish samples might be
     preferred
    over the analysis of composite samples is described in more detail in Appendix C.
     Recommended sample preparation procedures are discussed in Section 7.2
                                     Jay Field
                                      <Jay.Field@noaa.
                                     dox>
                                                                                                                                                                                  To
                                                                                                    Dana Davoli/R10/USEPA/US@EPA
```

10/02/2007 09:43 AM

```
Dana, does the guidance recommend using unequal amounts from each fish to
create the composite?
Davoli.Dana@epamail.epa.gov wrote:

Jay, for the PH RI Round 1 and this round of sampling we have been following the guidance given in USEPA "Guidance for Assessing
       Contaminant Data for Use in Fish Advisories". This guidance
       using the 0.75 length criteria for composites. We are using the entire
       fish, not an aliquot. Sex of the fish has not been considered. Thanks!
                     Jay Field
                     <Jay.Field@noaa.
                     gov>
       То
                                                 Dana Davoli/R10/USEPA/US@EPA
                     10/02/2007 09:20
       CC
                                                 Chip
       Humphrey/R10/USEPA/US@EPA,
                                                 Eric
       Blischke/R10/USEPA/US@EPA,
                                                 Burt
       Shephard/R10/USEPA/US@EPA,
                                                 Gina
       Grepo-Grove/R10/USEPA/US@EPA,
                                                 Jennifer L Peterson
       <PETERSON.Jenn@deq.state.or.us>,
                                                 jeremy_buck@fws.gov,
                                                 anderson.jim@deq.state.or.us
       , Joe
                                                 Goulet/R10/USEPA/US@EPA,
       MCCLINCY
                                                 Matt
       <MCCLINCY.Matt@deq.state.or.us>,
                                                 howp@critfc.org, POULSEN
       <POULSEN.Mike@deq.state.or.us>,
                                                 Rene
       Fuentes/R10/USEPA/US@EPA,
                                                 Robert.Neely@noaa.gov,
                                                 tomd@ctsi.nsn.us,
                                                 csmith@parametrix.com,
                                                 rgensemer@parametrix.com,
                                                 rose@yakama.com,
                                                 erin.madden@gmail.com, Lori
                                                 Cora/R10/USEPA/US@EPA,
                                                 BBarquin@hk-law.com,
                                                 audiehuber@ctuir.com,
                                                 Lisa.Bluelake@grandronde.org
                                                 sheila@ridolfi.com, Benjamin
       <Benjamin.Shorr@noaa.gov>,
                                                 LavelleJM@cdm.com,
                                                 Mary.Baker@noaa.gov,
```

Michael.Karnosh@grandronde.org

Subject

Re: Fw: Portland Harbor HH
bass

composites

Dana,
If you are compositing without taking equal aliquots from individual fish to create the composite sample, then you should consider using weight rather than length to estimate the relative contribution of

and large fish. For example, for the first composite on your spreadsheet, the proportion of smallest/largest is 0.75 for length and less than 0.4 for weight. Jay  $\frac{1}{2} \left( \frac{1}{2} \right) \left( \frac{1}{2} \right$ 

 ${\tt PS}$  Did they determine the sex of individual fish and consider that information in creating the composite samples?

Davoli.Dana@epamail.epa.gov wrote:

Mike Poulsen and I discussed bass compositing with Laura Kennedy from Kennedy-Jenks yesterday. We have compiled bass composites that would meet the objectives for the human health risk assessment. We would

like

input as to whether these composites will also meet the

objectives

for bass in the RI/FS, including the ecological risk assessment, the food web model, and identification of sources of contamination. Please let us know if these proposed composites are OK by COB Thursday,

October

4. Thanks!

---- Forwarded by Dana Davoli/R10/USEPA/US on 10/02/2007 08:43 AM

----

"POULSEN Mike"

<POULSEN.Mike@de

q.state.or.us>

То

Dana

Davoli/R10/USEPA/US@EPA

10/01/2007 04:19

CC

PM

Subject

Portland Harbor HH bass

composites

> > >

to

the

the

size

and

Dana -Based on our discussion with Laura Kennedy today, I created spreadsheet showing EPA's proposed selection of smallmouth be included in composites for use in the human health risk assessment. There are three objectives to collecting bass composites during Round Estimating risks to human health from consumption of fish

\* Estimating risks to ecological receptors, and assisting with refinement of the foodweb model

\* Identifying sources by identifying the presence chemicals in fish from separate reaches of the river We think that the compositing method proposed will meet the health risk assessment objective. However, we are seeking comments from the rest of the EPA team on whether this approach is appropriate to meet other objectives. I took LWG's R3B\_bass-carp\_lengths.xls spreadsheet, deleted carp data, deleted some columns on weight, and added columns summarizing the composites. For each river-mile portion (by bank), I sorted by fish length. The five longest fish are included in the proposed composites.

This is indicated by an "x" in the column next to the length. length. For comparison, data from Round 1 bass are included at the spreadsheet. Overall, the fish collected in Round 3 are similar in to the fish collected in Round 1. There were some large fish caught released in Round 3 because they were substantially larger than the planned limit of 355 mm. There were four fish greater than the maximum Round 1 length of 430 mm, with a maximum length of 530 mm. I do not think that omitting the released fish will have a substantial effect

the results of the chemical analyses.

Our original criteria for including fish in a composite were lengths between 225 mm and 355 mm, and a ratio of smallest fish in composite

on

```
largest fish of 0.75 or greater. This was to avoid a
      situation where
one
      large fish would dominate the concentration in a composite,
      and to minimize size as a variable that needs to be considered in
      evaluating the data. Fish that are longer generally weigh more, and are generally
      generally
      older than smaller fish. Older fish are more likely to have
accumulated
       chemicals of interest. Larger fish are more desirable as
      food fish.
For
      these reasons, including larger fish in the composite meets
      the needs
of
      the human health risk assessment. However, we understand
      fish may not be appropriate for the ecological risk assessment.
      that larger
      The selection criteria were not strictly applied in Round 1.
the
      fish included in composites were greater than 355 mm. The
      criterion of 0.75 was not always met. EPA and LWG accepted the composite
      approach
in
      Round 1, acknowledging that not all the criteria were met.
therefore
      do not feel strictly bound by the criteria in Round 3.
      Using the proposed compositing approach, four of the reaches
meet
      the 0.75 criterion: RM 6 East (0.74), RM 6 West (0.71), RM 8 \,
       (0.70), and RM 10 West (0.64). If the maximum length of 403
      removed from RM 10 West and replaced with the 251 mm value,
revised
      ratio is 0.77.
      In Round 1, the mean length in a composite was generally less than 300\,
      mm. In Round 3, the mean length is generally greater than 300~\text{mm},
      particularly in upstream sampling areas. The two areas with the
largest
      v. 315 mm West) and RM 11 (271 mm East v. 338 mm West). It is not clear if
      difference between sides of the river are RM 6 (271 mm East
      differences of this size in fish would confound comparisons
      of areas.
For fish of similar sizes, differences in concentrations may
related
      to proximity to source areas. However, if one of the reasons
           the
      differences in concentrations is the size (age) of fish,
      this could
      confound a determination of sources.
      - Mike
      <<HH bass composites R3B.xls>> (See attached file: HH bass composites R3B.xls)
Jay Field
Assessment and Restoration Division
Office of Response and Restoration, NOAA
```